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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 3:24-CR-00319-TSH
	)	
Plaintiff,	)	STIPULATED REQUEST TO CONTINUE
	)	STATUS HEARING AND EXCLUDE TIME
v.	)	UNDER SPEEDY TRIAL ACT; ORDER
	)	
ADEDEJI SHAMONDA,	)	
	)	
Defendant.	)	

The parties respectfully request that the status hearing set for January 8, 2026, be continued to February 5, 2026, or as soon as practicable thereafter. Counsel for the United States has a schedule conflict on January 8th, and the parties are still engaged in plea negotiations.

It is hereby also stipulated by and between counsel for the United States and counsel for Adedeji Shamonda that time be excluded under the Speedy Trial Act from January 8, 2026 through February 5, 2026, for effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). In response to defense counsel's request, the government has produced additional discovery materials. Defense counsel needs more time to review this new production of discovery materials and consult with his client about the evidence, and to engage in plea negotiations with the government. The parties therefore stipulate and agree that excluding time from January 8, 2026 through February 5, 2026, is necessary to allow for

1 effective preparation of defense counsel, taking into account the exercise of due diligence. 18 U.S.C.  
2 § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding  
3 the time from January 8, 2026 through February 5, 2026 from computation under the Speedy Trial Act  
4 outweigh the best interests of the public and the defendant in a speedy trial. *Id.* § 3161(h)(7)(A), (B)(iv).

5 The undersigned Assistant United States Attorney certifies that he has obtained approval from  
6 counsel for the defendant to file this stipulation and proposed order.

7 IT IS SO STIPULATED.

8 DATED: December 31, 2025

/s/ Michael G. Lagrama  
MICHAEL G. LAGRAMA  
Assistant United States Attorney

10 DATED: December 31, 2025

/s/ Samuel O'Keefe  
SAMUEL O'KEEFE  
DOUGLAS I. HORNGRAD  
Counsel for Defendant Adedeji Shamonda

13 **[PROPOSED] ORDER**

14 Based on the parties' stipulation and for good cause shown, the status hearing set for January 8,  
15 2026 is continued to February 5, 2026, at 9:30 a.m. Based on the parties' stipulation and for good cause  
16 shown, the Court also finds that failing to exclude the time from January 8, 2026 through February 5,  
17 2026 would unreasonably deny defense counsel and the defendant the reasonable time necessary for  
18 effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).  
19 The Court further finds that the ends of justice served by excluding the time from January 8, 2026  
20 through February 5, 2026 from computation under the Speedy Trial Act outweigh the best interests of  
21 the public and the defendant in a speedy trial.

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1 Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from  
2 January 8, 2026 through February 5, 2026 shall be excluded from computation under the Speedy Trial  
3 Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

4 IT IS SO ORDERED.

5  
6 DATED: December 31, 2025

  
HON. THOMAS S. HIXSON  
United States Magistrate Judge